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14 Chanel, Inc. and Louis Vuitton Malletier, S.A.

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16 THE UNITED STATES DISTRICT COURT
17 FOR THE NORTHERN DISTRICT OF CALIFORNIA

18 CHANEL, INC., a New York corporation) Case No. C-09-1972 BZ
19 and LOUIS VUITTON MALLETIER,)
20 S.A., a foreign business entity,)

21 Plaintiffs,)

22 v.)

23 TONY BOSINI and DOES 1-10,)
24 individually and jointly, d/b/a)
REPLICAMASTER.COM,)
SHOPREPLICA.COM,)
BUYHIGHREPLICA.COM,)
EREPLICABAGS.COM,)
EXACTWATCHES.NET,)
REPLICAHOURS.COM,)
SWISSREPLICA.US,)
THEWATCHESPRICEINDEX.INFO,)
YOURREPLICAWATCH.COM, and)
REPLICAHAUSE.COM,)

25 Defendants.)
26
27 **STIPULATED CONSENT FINAL
JUDGMENT**

28 WHEREAS, this action having been commenced by the Plaintiffs, Chanel, Inc. ("Chanel")
and Louis Vuitton Malletier, S.A. ("Louis Vuitton") (collectively the "Plaintiffs") against the

1 Defendant Tony Bosini d/b/a Replicamaster.com, Shopreplica.com, Buyhighreplica.com,
2 Erelicabags.com, Exactwatches.net, Replicahours.com, Swissreplica.US,
3 Thewatchespriceindex.info, Yourreplicawatch.com and Replicahause.com (the “Defendant”),
4 alleging *inter alia*, trademark counterfeiting and trademark infringement, and false designation of
5 origin and a copy of the Summons, Complaint and First Amended Complaint having been served
6 upon the Defendant:

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8 IT IS STIPULATED, ORDERED, ADJUDGED AND DECREED that:

9 1. This Court has jurisdiction of the subject matter of all counts of this action and over
10 the named parties hereto.

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12 2. Defendant stipulates he owns and/or controls all right, title and interest in and to the
13 domain names identified on Schedule “A” hereto (the “Subject Domain Names”), and the associated
14 websites.

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16 3. Defendant stipulates to the immediate transfer to Plaintiffs of all ownership, right,
17 title and interest in and to all of the Subject Domain Names, excluding the four names identified on
18 Schedule “B” hereto. Defendant will assist Plaintiffs as necessary to complete the immediate
19 transfer of the Subject Domain Names, excepting those on Schedule “B”, by unlocking the Subject
20 Domain Names to be transferred with the current registrar and provide the Authorization Code (EPP
21 code) for those domain names to Plaintiffs’ counsel, Stephen M. Gaffigan, Esq.

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23 4. Should the Defendant fail to voluntarily transfer the appropriate Subject Domain
24 Names as required by Paragraph 2 herein within fifteen (15) days of entry of this Order, the Subject
25 Domain Names are hereby ordered to be immediately transferred by the Defendant’s assignees
26 and/or successors in interest or title, and/or the Registrars to Plaintiffs’ control. To the extent the
27 then current Registrars do not transfer the Subject Domain Names to Plaintiffs’ control within seven
28 (7) days of receipt of a copy of this Judgment, the United States based Registry shall, within thirty

1 (30) days of receipt of a copy of this Judgment, transfer the Subject Domain Names to a United
2 States based Registrar of Plaintiffs' choosing, and that Registrar shall transfer the Subject Domain
3 Names to Plaintiffs.

4 5. In the event the Plaintiffs ever demonstrate to the Court with appropriate and
5 admissible evidence that the Defendant is in violation of the terms of the Permanent Injunction in
6 this matter, the Plaintiffs shall also be granted the immediate transfer of all right, title and interest in
7 the Domain Names set forth on Schedule "B" hereto to their ownership and control. For purposes of
8 this Paragraph, cached pages of internet search engines and 3rd party sites over which Defendant has
9 no control shall not alone constitute a violation of the Permanent Injunction.

10 6. The provisions of this Stipulation and Order shall be binding on the Defendant and
11 any successors in interest or assignees of the Subject Domain Names.

12 7. This cause between the Plaintiffs and the Defendant is hereby dismissed, with
13 prejudice, subject to the terms of the Settlement Agreement between the parties.

14 8. The parties' respective attorney's fees and costs incurred in connection with this
15 action shall be borne as per the agreement of the individual parties in their Settlement Agreement.

16 9. This Court will retain continuing jurisdiction over this cause (1) to construe, enforce
17 and/or implement the terms of this Judgment and the Permanent Injunction upon application by any
18 party; and (2) for the purpose of making any orders that are necessary or proper for the construction,
19 modification or enforcement of this Judgment and the Permanent Injunction, or for the punishment
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1 of any violation thereof.

2 SO STIPULATED:

3 **Plaintiffs:** Chanel, Inc. and Louis Vuitton Malletier, S.A.

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5 By their Attorney:

STEPHEN M. GAFFIGAN,
A PROFESSIONAL ASSOCIATION

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8 By: /s
Stephen M. Gaffigan

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Attorneys for Plaintiffs
Chanel, Inc. and Louis Vuitton Malletier, S.A.

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Defendants: Tony Bosini d/b/a Replicamaster.com, Shopreplica.com, Buyhighreplica.com,
Ereplicabags.com, Exactwatches.net, Replicahours.com, Swissreplica.US,
Thewatchespriceindex.info, Yourreplicawatch.com, and ReplicaHause.com

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By his Attorney:

LAW OFFICE OF AYAL ABRAMS

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By: /s
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Attorneys for Defendant
Tony Bosini



UNITED STATES MAGISTRATE JUDGE

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Copies furnished to:

30

All parties of record

SCHEDULE "A"

1. Replicamaster.com
2. Shopreplica.com
3. Buyhighreplica.com
4. Ereplicabags.com
5. Exactwatches.net
6. Replicahours.com
7. Swissreplica.us
8. Thewatchespriceindex.info
9. Yourreplicawatch.com
10. Replicahause.com

SCHEDULE "B"

1. Replicahause.com
2. Replicamaster.com
3. Exactwatches.net
4. Swissreplica.us